

**UNITED STATES DISTRICT COURT**  
for the

Western District of Tennessee

BROADCAST MUSIC, INC.; WELSH WITCH MUSIC;  
PRIMARY WAVE MUSIC IP FUND 2 GP, LLC and  
PWMP VENTURES, LLC, a LIMITED PARTNERSHIP d/  
b/a PRIMARY WAVE BOPS; BEECHWOOD MUSIC  
CORPORATION; COMBINE MUSIC CORP.; HIP CITY  
MUSIC INC.; and HIFROST PUBLISHING

*Plaintiff(s)*

v.

Civil Action No. 2:24cv2204 SHL/cgc

ROCKHOUSE LIVE COLLIERVILLE, LLC d/b/a  
ROCKHOUSE LIVE COLLIERVILLE and  
ZACH BAIR, individually,

*Defendant(s)*

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**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* Zach Bair  
336 New Byhalia Road  
Collierville, TN 38017

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Hannah-Catherine Lackey  
Frost Brown Todd LLP  
150 3<sup>rd</sup> Ave South, Suite 1900  
Nashville, TN 37201  
615-251-5550 Telephone  
[hlackey@fbtlaw.com](mailto:hlackey@fbtlaw.com)

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: 4/2/2024



s/ Judy Easley

*Signature of Clerk or Deputy Clerk*

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Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for (*name of individual and title, if any*) \_\_\_\_\_  
was received by me on (*date*) \_\_\_\_\_.

- I personally served the summons on the individual at (*place*) \_\_\_\_\_  
on (*date*) \_\_\_\_\_; or
- I left the summons at the individual's residence or usual place of abode with (*name*) \_\_\_\_\_,  
a person of suitable age and discretion who resides there,  
on (*date*) \_\_\_\_\_, and mailed a copy to the individual's last known address; or
- I served the summons on (*name of individual*) \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of (*name of organization*) \_\_\_\_\_  
on (*date*) \_\_\_\_\_; or
- I returned the summons unexecuted because \_\_\_\_\_; or
- Other (*specify*): \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_ *Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: